**Before the**
**FEDERAL COMMUNICATIONS COMMISSION**
**Washington, D.C. 20554**



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| In the Matter of | ) | |
| | ) | |
| Implementation of the Local | ) | CC Docket No. 96-98 |
| Competition Provisions in the | ) | RM 9101 |
| Telecommunications Act of 1996 | ) | |

# REPLY COMMENTS OF THE ASSOCIATION FOR LOCAL TELECOMMUNICATIONS SERVICES

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## SUMMARY

The initial comments on LCI-CompTel's petition for expedited rulemaking fully demonstrate their petition should be granted promptly. The ILECs try to argue that performance standards contained in approved interconnection agreements should be adequate to discharge their legal obligations, but they refuse to acknowledge that voluntary agreements cannot be relied upon to properly mark out the full extent of their legal obligations inasmuch as the Commission declined in its original Local Competition Order to impose such requirements (at ¶ 310).

Furthermore, the ILECs try to deflect the thrust of LCI-CompTel's petition by contending that mere interfaces are adequate to accomodate the needs of CLECs, and that traditional standards bodies are more than up to handling any such needs. But it is clear that flowthrough functionality, not just interface standards, is necessary to meet the non-discriminatory parity standard for OSS provisioning, and that traditional ILEC-dominated bodies cannot be relied upon for timely or effective action even on the limited issue of interfaces.

If OSS provisioning by the ILECs is really going to work, it must:

- Include functionality in addition to interfaces;
- Reflect standards that are negotiated with the CLEC industry and not just promulgated through "standards bodies"; and,

- Be validated through robust, public, timely reports fully supported by an adequate audit trail.

Now that ILECs are calling into question the viability of the "network platform" approach as a result of the recent Eighth Circuit decision vacating portions of the Local Competition Order,[1] the Commission should take special care to accomodate the OSS needs of facilities-based competitors. Such OSS systems must be able to:

- Reference the availability of ILEC UNEs during a CLEC's pre-ordering discussion with a CLEC's potential end users;
- Track the individual progress of each and every individual UNE ordered for a particular CLEC end user during the ILEC provisioning process; and,
- Track the overall progress of combinations of UNE elements, where each UNE within these combinations is needed to turn up service for a CLEC end user (this would help insure, for example, that the cutting of dialtone properly coincides with the implementation of interim number portability).

ALTS encourages the Commission to employ multiple approaches to the formulation of appropriate OSS measurements and standards -- negotiated rulemaking, advisory committees, etc. -- provided that no single approach is given exclusive authority. For example, if industry groups achieve an effective negotiatied rulemaking, the Commission should put it into effect promptly

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[1] See "GTE North Inc.'s Supplemental Comments Regarding the Previously Filed Interconnection Agreement in Light of the Eighth Circuit's Opinion and Letter," filed July 29, 1997, in PUCO Case No. 96-832-TP-ARB at 9: "What 'came out of St. Louis' is an opinion that draws a clear distinction between offering services through resale and offering services through the recombination of UNEs."

even if a public advisory committee has also been appointed -- a committee which might contain state representatives -- and has not completed its own deliberations.

The bottom line here is that ILEC legal compliance with OSS requirements are essentially meaningless without effective quantitative measurments, standards, and remedies for violations. Indeed, the ILECs' own reliance on internal measurements and standards is ample demonstration of the plain business need for a quantitative approach to OSS compliance. ALTS respectfully asks that the Commission take prompt action on the LCI-CompTel petition.

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**REPLY COMMENTS OF THE ASSOCIATION**
**FOR LOCAL TELECOMMUNICATIONS SERVICES**

The Association for Local Telecommunications Services ("ALTS") hereby files its reply comments in support of the LCI-CompTel petition for expedited rulemaking in the above-captioned proceeding.

## INTRODUCTION

The success of the Telecommunications Act of 1996 has been hotly debated in the media in the past few months. Both Congress and the Commission have expressed concerns about the progress of competition in local markets. The petition for expedited rulemaking offers the Commission a significant opportunity to accelerate that progress.[2]

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[2] On July 18, 1997, the Commission released a Public Notice seeking recommendations on Commission actions critical to the promotion of efficient local exchange competition (DA 97-1519). The members of ALTS intend to respond to that notice more fully on August 11th, but simply note here that grant of the instant petition is one of the most important things that the Commission could do to promote full and fair competition in the local exchange markets.

It is beyond dispute that the OSS functions discussed in the petition are critical to the establishment of competition in local markets. Adoption of the rules and standards requested by LCI and CompTel would be a significant step toward the timely development of competitive markets. Thus, it is imperative that the Commission act quickly on the petition. At a minimum, the Commission should immediately order each ILEC to disclose and describe each performance measurement and standard that it currently uses. The Commission should then establish mandatory OSS functional performance measurements,[3] impose monthly quantitative reporting requirements, and, as much as possible, provide for self-effectuating remedies in the event ILEC performance falls below the parity standard for CLECs.

The initial comments of the incumbent local exchange carriers ("ILECs") generally argue there is no need for the Commission to commence a rulemaking because they are either fully in compliance with the requirements relating to preordering, ordering, provisioning, billing, repair and maintenance, and related functions, or are making such progress that they will be fully in compliance shortly. The ILECs spend considerable amounts of paper discussing their efforts to comply with the Commission's requirements, and the reasons why the system

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[3] The shorthand term "OSS functions" is used herein. ALTS includes in that term all functions necessary to permit new entrants "a meaningful opportunity to compete" (Local Competition Order at ¶ 312), and is not limiting this phrase to the particular OSS functions that new entrants pursuing a resale strategy need from ILECs.

interfaces with the CLECs are as good as the interfaces used by their own personnel, or, in some cases, purportedly better in terms of ease of use.

With all due respect to the ILEC commenters, if their systems were in fact in compliance with the parity requirement, or will shortly be in compliance, there would be no sound reason for their refusal to demonstrate that compliance to the states,[4] the Commission, or the users of these systems. In addition, if some of the systems that are being offered to the CLECs are better and easier to use than their own systems, the obvious question is why they have not adopted those better and easier systems for themselves.

ALTS submits it is clear that OSS and related functions are not being provided to CLECs on a nondiscriminatory (i.e., parity) basis, nor in a manner that will allow robust competitive local telecommunications services to develop. The Commission must act quickly to ensure that lack of fully functioning, non-discriminatory OSS functions does not become an insurmountable roadblock to effective local competition.

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[4] See Comments of the Wisconsin PSC at 2.

## I. THE COMMISSION HAS THE AUTHORITY TO COMMENCE THE RULEMAKING THAT LCI AND COMPTEL HAVE REQUESTED.

The Eighth Circuit Court of Appeals decision in Iowa Utilities Board v. Federal Communications Commission, No. 96-3321 (8th Cir.; decided July 18, 1997), specifically found that the Commission has the jurisdiction to issue rules relating to unbundled network elements. Id. at note 10. The court did not disturb the Commission rule requiring ILECs to provide competitive carriers with the "pre-ordering, ordering, provisioning, maintenance and repair and billing functions of the incumbent local exchange carrier's operations support systems." 47 C.F.R. § 51.313(c).

Nor did the Court disturb the Commission's determination that access to unbundled network elements must be provided on terms and conditions "no less favorable to the requesting carrier than the terms and conditions under which the incumbent local exchange carrier provides such elements to themselves." Id. at § 51.313(b). Thus, the LCI/CompTel request, which in effect seeks Commission clarification and enforcement of these provisions, is clearly within the jurisdiction of the Commission.[5]

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[5] The LCI/CompTel petition asks that the Commission enter an expedited order requiring each ILEC to disclose and fully describe each OSS function for which it has established performance standards, and to identify those functions for which it has not established performance standards for itself. In addition, the petition asks that the Commission also determine the appropriate minimum performance standards for each OSS function and any related OSS requirements, like beta testing, to (continued...)

The Commission also clearly has jurisdiction, as well as an obligation under Section 271 of the Act, to articulate the standards it will consider in determining whether the Regional Bell Operating Companies have satisfied the competitive checklist of Section 271(c)(2) prior to filing an application for authority to provide interLATA service originating or terminating within their LATAs. To the extent that the Commission specifies in advance the standards under which it will evaluate RBOC compliance with the competitive checklist requirements, the Commission will be in a far better position to evaluate individual Section 271 applications within the tight time constraints of the Act.

## II. THE COMMISSION SHOULD IMMEDIATELY ORDER THE ILECS TO DISCLOSE THEIR OSS PERFORMANCE MEASUREMENTS AND STANDARDS.

As the Commission is well aware, and has stated many times, fully functioning non-discriminatory OSS systems are vital to the provision of service by competing carriers.[6] That is precisely why the Commission ordered the ILECs to provide OSS functions at a level of quality the is "no less favorable" than that which the incumbent local exchange carrier provides to itself by January 1,

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[5](...continued)
ensure operability and scalability under the "parity standard." Finally, the petition seeks a Commission rule requiring the ILECs to file various reports designed to ensure that its performance intervals meet the non-discriminatory "parity" standard.

[6] See, e.g., Local Competition Order, CC Dkt No. 96-98, 11 FCC Rec 15499 (1996), vacated in part, Iowa Util. Bd. v. FCC, No. 96-3321 (8th Cir.; decided July 18, 1997).

1997.[7] Eight months have passed and, while progress is being made in some areas, it does not appear that there are any fully functioning OSS systems that would meet this requirement, particularly with respect to unbundled network elements.

As a practical matter there is simply no way to tell whether an ILEC is providing OSS functions to competing carriers at parity without having a robust quantitative understanding as to exactly what the ILEC is actually providing to itself. Currently the Commission and other interested parties do not even know how the ILECs measure their own performance, much less what that performance level is.

In its comments submitted on July 16, 1996, LCI included an Appendix A entitled "Suggested Commission Action relating to OSS Performance Standards, Reporting Requirements, Technical Standards and Remedies," and an Appendix B entitled "Suggested Draft Rules for OSS Performance Standards." In those suggested draft rules LCI suggested a process for adoption of performance measurements and performance standards. ALTS agrees with much of the proposed rules, but suggests it is unnecessary to employ a procedure with two distinct rulemaking steps: a rulemaking to adopt procedural rules, and then an expedited rulemaking to adopt substantive rules.

The Commission need only follow the procedure described

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[7] Id.

below. First, in order to begin the process expeditiously, the Commission should release an order as soon as possible (i.e., within two weeks) pursuant to its general jurisdiction and its Section 271 authority that requires the ILECs to submit to the Commission the information relating to the performance measures and standards that they currently have and maintain for themselves.[8] The ILECs should be required to identify and explain how each performance measurement currently in use is performed, and give samples of their current performance measurement reports. This information should be submitted to the Commission and made public within 21 days of the Order. The Commission has ample authority to require these reports without going through a rulemaking proceeding.[9]

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[8] Inasmuch as all the RBOCs have proclaimed the benefits of their entry into long distance as soon as possible (though ALTS disputes whether these claimed benefits come anywhere close to the potential benefits of effective local competition), the Commission need not wait for the RBOCs to file Section 271 applications in order to exercise its Section 271 powers immediately. Accordingly, the Commission should impose general measurement and performance obligations on all RBOCs as quickly as possible in order to generate an appropriate record on OSS performance in advance of any Section 271 applications.

Concerning non-RBOC ILECs, the Commission should impose the same performance measurements required of RBOCs, using its unquestioned authority to require reporting from any interstate carrier. However, given the current ambiguity as to the precise delineations of authority under Section 251 and 252, the Commission should temporarily defer the issue of performance standards and remedies as to non-RBOC ILECs until the ultimate status of the recent Eighth Circuit decision becomes clearer.

[9] While a rulemaking may be the most appropriate administrative procedure when the Commission seeks to adopt on-going reporting requirments of general applicability, the Commission clearly has the authority to require the submission of

(continued...)

Early receipt of the information relating to performance measurements and standards that the ILECs currently maintain for themselves would enable the Commission and all interested parties to start the process of considering how those measurements and standards may need to be modified or amplified for all types of competitive carriers. The Commission need only then commence the rulemaking that LCI and CompTel have requested. The basic procedural rules for the expedited rulemaking should be articulated in the NPRM. Thus, for example, the Commission should require that within ten days of the adoption of the NPRM, (as opposed to adoption of an order) the representatives of each affected party and of the government observers/participants shall be identified to the Common Carrier Bureau of the Commission for the purpose of recommending to the Commission appropriate performance standards.[10]

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[9](...continued)
information necessary for it to enforce provisions of the Act. See 47 U.S.C. § 403.

[10] ALTS encourages the Commission to be receptive to using multiple alternative means of reaching industry agreement, such as negotiated ratemaking, use of a public advisory committee including state representatives, etc., so long as none of these approach is exclusive. I.e., the Commission should make it clear in advance that it will take prompt action if a successful negotiated rulemaking is achieved among industry groups even before a public advisory committee completes its task, in the event such a body is employed.

## III. THE PERFORMANCE MEASURES AND REPORTING REQUIREMENTS ADOPTED MUST ENABLE MEANINGFUL ANALYSIS OF EACH ELEMENT AND OVERALL OSS-RELATED PERFORMANCE.

### A. The Needs of Facilities-Based CLECs Are Different from Resellers, and Those Needs Must Be Accommodated.

As ALTS pointed out in its initial comments, and DOJ underscored in its recent Ameritech-Michigan comments, there are three basic modes of competitive entry into local telecommunications markets: (1) resale; (2) use of certain unbundled network elements such as loops (UNE entry); and (3) separate facilities. Each of these approaches requires new entrants to employ at least some aspects of incumbent networks,[11] and each approach has its own particular needs in regard to performance measurements and standards.

In particular, UNE entry has special needs for performance measurements and standards. While resale competitors may be able to use many of the ILECs' current measurement systems, UNE competitors also need:

- To be able to reference the availability of ILEC UNEs during a CLEC's pre-ordering discussion with a CLEC's potential end users;
- To be able to track the individual progress of each and every individual UNE ordered for a particular CLEC end user during the ILEC provisioning process; and,
- To be able to track the overall progress of combinations of UNE elements, where each UNE within these combinations is

[11] Even carriers that use no physical facilities of the incumbents in the provisioning of their services need to exchange switched traffic with the incumbents, handle E911 calls, and port numbers, for example.

needed to turn up service for a CLEC end user (this would help insure, for example, that the cutting of dialtone properly coincides with the implementation of interim number portability).

Contrary to the dismissive statements of some ILECs, facilities-based entry remains an important -- and in the final analysis, the most important -- mode of competitive entry.[12] Congress clearly recognized the preeminent role of facilities-based competition in making the existence of such competition in both business and residence markets a requirement for "Track A" approval under Section 271(c)(1)(A). And though their current market penetration may be lower than facilities-based competitors might wish, there is no lack of commitment in terms of hard cash. The members of ALTS have spent many hundreds of millions of dollars in the past few years building competitive transport and switches, and need unbundled local loops from ILECs to close the "last mile" between their customers and these competitive resources.

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[12] In their comments Pacific Bell, Nevada Bell, and Southwestern Bell state that there has been "little if any new investment in local facilities" since the passage of the 1996 Act. The members of ALTS beg to differ. ALTS estimates that competitive local exchange carriers have raised approximately $10 billion since the passage of the Act. Competitive carriers have deployed hundreds of thousands of circuit miles of fiber and installed switches all over the country.

As the ILECs well know, competitive carriers have not been lax in attempting to build networks; rather any slowness in the pace of construction and the provision of new services has been primarily caused by roadblocks put up by the ILECs, cities, and to some extent the owners of buildings who have been hesitant to allow CLECs to use space in their buildings unless they pay exorbitant fees.

The importance of facilities-based competition -- and thus the need for OSS measurements and standards which fully accommodate the needs of facilities-based competitors -- is also underscored by the recent Eighth Circuit decision. The Eighth Circuit held that: " ... the FCC's rule requiring incumbent LECs, rather than the requesting carriers, to recombine network elements that are purchased by the requesting carriers on an unbundled bases, 47 C.F.R. § 51.315(c)-(f), cannot be squared with the terms of subsection 251(c)(3)" (slip opinion at 141).

It is ALTS' understanding that some ILECs are already relying upon this language as a basis for refusing to provide the UNE platform.[13] ALTS takes no position as to whether these interpretations are correct, or whether the Eighth Circuit's decision will remain intact after rehearing or petitions for review to the Supreme Court. What is pertinent for present purposes is that because the viability of the network platform approach is being contested by ILECs as a result of the Eighth Circuit's decision, it is unmistakably essential that the OSS needs of facilities-based competitors be properly implemented.

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[13] See "GTE North Inc.'s Supplemental Comments Regarding the Previously Filed Interconnection Agreement in Light of the Eighth Circuit's Opinion and Letter," filed July 29, 1997, in PUCO Case No. 96-832-TP-ARB at 9: "What 'came out of St. Louis' is an opinion that draws a clear distinction between offering services through resale and offering services through the recombination of UNEs."

### B. Performance Measures and Reports Must Include Both Interface and Flowthrough Functionality.

In considering whether the ILECs have satisfied the nondiscrimination requirement with respect to OSS and related functions, it is imperative that the Commission consider (and the ILECs measure) flowthrough functionality. Interface standards are an important tool for achieving adequate flowthrough functionality, but they are only a tool to that end, and not the end itself. Facilities-based CLECs need OSS support which:

- Evolves in a logical, cost-effective manner over time to reflect the particular volumes, needs, and internal systems of the customer CLECs.
- Reflects the CLECs' own requirements, rather than unilateral pronunciamentos from RBOCs (such as Ameritech's dissemination of interface standards through its cyber-transom on the World Wide Web).
- Is standardized to the extent requested by the CLECs themselves, not by forums dominated by ILECs or otherwise indifferent to the needs of CLECs.

Perhaps the easiest way for the ILECs to discharge these requirements would be to allow CLECs to have direct access to the ILECs' legacy systems. Privacy or competitive concerns can be handled through firewalls or other mediation mechanisms, if necessary, in order to protect sensitive information. Alternatively, direct access could be self-policing. Furthermore, considering the cost of creating new electronic data interfaces and flowthrough functionalities, direct access may well prove the most economically efficient manner in which to

provide parity.[14]

### C. Performance Measures and Reports Must Be on a Geographically Disaggregated Basis and Sufficiently Detailed to Ensure Valid Comparisons.

In its initial comments submitted on July 10, 1997, ALTS identified a number of characteristics that any performance measurements reports should contain:

- Reports should be structured in such a way as to enable meaningful comparisons between companies.
- The reports must be publicly available.[15]
- Reports should be auditable.
- Reports should be timely.
- Reports should include the statistics of all legacy OSS systems.

In addition, information should be collected and reports filed on a geographically disaggregated basis. If information where not geographically disaggregated, there would be no ability for the Commission, the states or the CLECs to discern whether there are important differences in performance based upon whether or not the ILEC faces competition in a particular area. Disaggregation would not need to be on an end office by end office basis.

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[14] Competitive confidentiality and sabotage protection is fully accommodated in various robust systems shared by competitors, most notably the airline and hospitality industries.

[15] We agree with various comments that all reports except for reports as to individual CLECs should be made public. CLEC reporting should be made public only in the aggregate.

In addition, the Commission must ensure that measurements are performed in such a manner so as to enable meaningful comparisons. For example, requiring information only on the average time for provisioning of a particular service could mask the fact that the mean time is very different for the CLECs as a whole and the particular ILEC. Thus, performance measurements and reports may need to be conducted and published using a number of different quantitative measures for the same functions.

## IV. THERE IS NO NEED FOR THE COMMISSION TO ADOPT TECHNICAL STANDARDS FOR OSS AT THIS TIME.

While it is clear that technical standards for electronic OSS interfaces could increase the speed of introduction of competitive services in many areas, the members of ALTS do not believe that it makes sense at this time for the Commission to pursue this goal by trying to set technical standards itself. The pressing need at this time is for the Commission to quickly articulate what it means by "parity," and how it will assess whether parity has been reached. In the past, industry negotiations have been successful in establishing industry standards where necessary.

The members of ALTS fear that should the Commission undertake the job of establishing technical standards, the establishment of the performance measures and standards will be slowed. The most effective use of the Commission's time is to establish those standards as soon as practical, and to reevaluate

the need for further technical standards at a later date. In addition, it does not appear desirable to adopt mandatory uniform interfaces at this time given the different business strategies and stages of development of various entrants at this time.

Rather, Commission involvement in the setting of technical standards should be limited to actions that will facilitate and induce the appropriate industry groups to work diligently and quickly on these matters. The Commission should consider adopting a schedule for the resolution of issues and take whatever administrative actions (such as moderating meetings) are appropriate to aid the relevant industry groups.

## V. THE COMMISSION SHOULD ENSURE THAT PARITY OF OSS PERFORMANCE IS ACHIEVED BY ADOPTING MEANINGFUL AND, AS MUCH AS POSSIBLE, SELF-EFFECTUATING REMEDIES.

When an ILEC fails to comply with Commission-mandated parity requirements, the remedy must be one that is significant enough to ensure there is an incentive for the ILEC not to fall below the standard a second time. The ILECs have no natural or inherent incentive to open their markets to competition, and particularly to facilities-based competition. Monetary penalties must be quite high before most incumbents would even notice them on their bottom line.

ALTS therefore reiterates its suggestion, which was supported by a number of other commenters, that for significant or ongoing violations of the rules the Commission should consider, pursuant to Section 271(d)(6), suspending or revoking

RBOC in-region interLATA authority (or suspending the RBOCs ability to sign up new customers.)

## VI. THE COMMISSION NEEDS TO MAKE IT CLEAR THAT THE RULES IT ADOPTS APPLY TO EXISTING INTERCONNECTION AGREEMENTS.

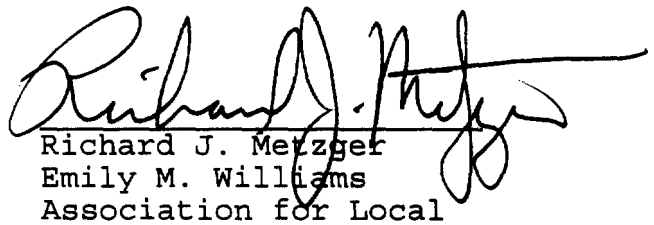
Many existing interconnection agreements contain only very general language about quality of service measurements and standards. In large part this is due to the ILECs' general reluctance to reveal the types of information that would have enabled CLECs to include more specific measurements and standards.

To the extent that Commission action elaborates and clarifies the meaning of its existing rules relating to nondiscriminatory pre-ordering, ordering, provisioning, repair and maintenance and billing, any new rules or Order will need, of course, to apply to existing agreements. The Commission thus needs to make clear that any remedies or enforcement mechanisms adopted by the Commission will also apply to existing interconnection agreements.

## CONCLUSION

The Commission should place a high priority on acting on the LCI/CompTel petition. Failure to act quickly will only delay the prompt introduction of competitive local exchange services.

Respectfully submitted,



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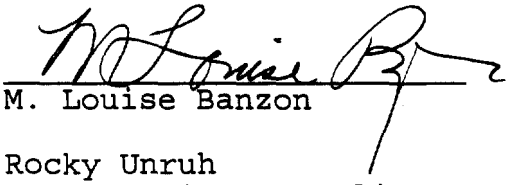
July 30, 1997

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Reply Comments of the Association for Local Telecommunications Services was served July 30 1997, on the following persons by first-class mail or by hand service as indicated.



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